

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

In re: )  
)  
JUMBO MINING COMPANY, ) Case No. 97-14326 FRM  
a Texas corporation, )  
)  
Debtor. )

NOTICE OF INTENT TO TAKE RULE 2004 EXAMINATION

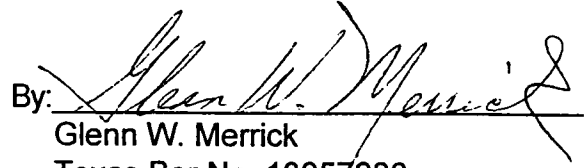
TO: EDWIN B. KING, 6305 FERN SPRING COVE, AUSTIN, TEXAS 78730

PLEASE TAKE NOTICE that Western States Minerals Corp., intends to take a Rule 2004 examination of Edwin B. King, on April 17, 1998 at 9:00 a.m., and continuing from day to day thereafter until completed, at the law offices of James V. Hoeffner, Suite 2600, 515 Congress Avenue, Austin, Texas 78701, before a certified shorthand reporter or other person duly authorized to administer oaths and take testimony. The scope of the examination shall be the acts, conduct, property and liabilities of the Debtor, the Debtor's financial condition, and its dealings with and relationship to Edwin B. King and Janet King and their respective "affiliates" [as that term is defined in 11 U.S.C. §101(2)].

THIS IS ALSO NOTICE that Mr. King is to produce for inspection and duplication at the offices of James V. Hoeffner, Suite 2600, 515 Congress Avenue, Austin, Texas 78701 any and all documents set forth in Exhibit "A" attached hereto at 9:00 a.m. on April 16, 1998.

Dated: March 30, 1998.

BREGA & WINTERS P.C.

By: 

Glenn W. Merrick  
Texas Bar No. 13957980  
Suite 2222  
1700 Lincoln Street  
Denver, Colorado 80203  
Telephone: (303) 866-9400

ATTORNEYS FOR WESTERN STATES  
MINERALS CORP.

CERTIFICATE OF SERVICE

The undersigned certifies that on the 30th day of March, 1998, the foregoing NOTICE OF INTENT TO TAKE RULE 2004 EXAMINATION was served upon the Debtor, the Trustee, the Office of the United States Trustee and other parties in interest transmitting true and genuine copies via facsimile transmission and U.S. mail, postage prepaid, to the following persons:

James V. Hoeffner, Esq.  
Suite 2600  
515 Congress Avenue  
Austin, Texas 78701  
Fax: (512) 476-8434

C. Daniel Roberts, Esq.  
Suite 415  
1515 Capital of Texas Highway South  
Austin, Texas 78746  
Fax: (512) 327-7088

Randolph N. Osherow, Esq.  
Suite 300  
342 West Woodlawn  
San Antonio, Texas 78212  
Fax: (210) 737-6312

Office of the U.S. Trustee  
Suite 230  
903 San Jacinto Boulevard  
Austin, Texas 78701  
Fax: (512) 916-5331

Bureau of Land Management  
Arizona State Office/Mining  
Branch  
P.O. Box 16563  
Phoenix, AZ 85011

Bureau of Land Management  
P.O. Box 12000  
Reno, Nevada 89520

Bureau of Land Management  
Utah State Office  
324 S. State St., Suite 301  
Salt Lake City, UT 84111

E.B. and Janet King  
6305 Fern Spring Cove  
Austin, Texas 78730

Holland & Hart, LLP  
555 17th St., Suite 3200  
Denver, Colorado 80202

IBEX Gold Mining Trust  
12454 E. Brickyard Rd., No. 530  
Salt Lake City, UT 84106  
Att'n: P. Robert Knight

Mizpah Mining Company  
P.O. Box 336  
Delta, UT 84264

Nevada Division of Environmental  
Protection (Mining)  
333 W. Nye Lane, Room 138  
Carson, City, Nevada 89706-1851

State of Utah Lands Admin.  
3 Triad Center, Suite 400  
335 West North Temple  
Salt Lake City, UT 84180-1204

Utah Dept. of Environment  
P.O. Box 144870  
Salt Lake City, UT 84114-4870  
Att'n: Mr. Rupp, P.E.

Utah Div. of Oil, Gas & Mining  
1594 West North Temple  
Suite 1210  
Salt Lake City, UT 84114-5801

U.S. Dept. of the Interior  
Land Management, Ariz. Mining Branch  
P.O. Box 555  
Phoenix, AZ 85001-1555



---

**EXHIBIT A**  
**LIST OF DOCUMENTS TO BE PRODUCED**

For purposes of this List of Documents to be produced, the following definitions and instructions apply:

A. As used herein, "document" or "documents" shall mean all correspondence, minutes, memoranda, reports, drafts, telecopy messages, notes, books, bookkeeping entries, records, contracts, agreements, and all other writings or recorded information of any nature or description whatever as described in F.R.E. 1001 (1), including any duplicates or copies thereof to the extent that they contain notations or markings not found on the original documents, together with all other items which are subject to request for production under Rule 34 of the Federal Rules of Civil Procedure.

B. As used herein, "relating to" means any of the following (in whole or part): supports, proves, tends to prove, is associated or affiliated with, is connected with, corresponds to, complements, provides background for, evidences, embodies, includes, comprises, refers to, explains, mentions, describes, contradicts or tends to contradict.

C. As used herein, the word "and" and the word "or" shall mean "and/or."

D. As used herein, the singular shall include the plural and the plural shall include the singular.

E. If any responsive document was in Mr. King's actual or constructive possession, custody or control, but has been lost or has otherwise been subject to disposal:

- (1) identify each such document;
- (2) state how and why the document was lost or has otherwise been subject to disposal; and
- (3) state when the document was lost or was otherwise subject to disposal.

F. To the extent that any document(s) (or portions thereof) requested herein are not produced on grounds of privilege or attorney work product (or for any other reason):

- (1) identify each such document;

- (2) identify each person to whom the contents (or any part thereof); was disclosed for each such document;
- (3) state the grounds for refusal or failure to produce each such document (or any portion thereof); and
- (4) describe the contents of each such document in sufficient detail to allow the Court to rule on any claim of privilege or work product.

#### Documents to be Produced

1. All documents relating to the formation and/or incorporation of Jumbo Mining Company, Asoma (Utah) Inc. and/or Asoma Instruments, Inc.
2. The corporate record books for Jumbo Mining Company, Asoma (Utah) Inc. and Asoma Instruments, Inc. (including articles of incorporation, bylaw, minutes of meetings, resolutions, shareholder register, stock transfer register, etc.)
3. All documents relating to the identities of the shareholders, directors and officers of Jumbo Mining Company, Asoma (Utah) Inc. and/or Asoma Instruments, Inc.
4. All documents relating to the initial or subsequent capitalization of Jumbo Mining Company, Asoma (Utah) Inc. and/or Asoma Instruments, Inc. (including initial capital contributions, subsequent equity/debt capital infused, retained earnings, etc.)
6. All documents relating to hiring or retention of any employees by Jumbo Mining Company and/or Asoma (Utah) Inc.
7. All tax returns filed with any federal, state or local government units by Jumbo Mining Company and/or Asoma (Utah) Inc.
8. All reports, statements, or other documents filed with any government agencies or units (including the Texas Secretary of State, the Bureau of Land Management, the Utah Division of Oil, Gas & Mining and the Arizona Branch of Mining) by Jumbo Mining Company and/or Asoma (Utah) Inc.
9. All documents relating to any intercompany debt, and/or any security therefor, between or among Jumbo Mining Company, Asoma (Utah), Inc. and Asoma Instruments, Inc.

10. All documents relating to any loans, extensions of credit or other financial accommodations, and/or any security therefor, extended to Jumbo Mining Company, Asoma (Utah) Inc. and/or Asoma Instruments, Inc. by Edwin B. King and/or Janet King.

11. All documents relating to any wages, salary, commissions, bonuses, repayments of loans, reimbursement of expenses, transfers of assets, dividends or other distributions or transfers of any kind or nature to Edwin B. King and/or Janet King by Jumbo Mining Company or Asoma (Utah) Inc.

12. All documents relating to any financing for Jumbo Mining Company, Asoma (Utah) Inc. and/or Asoma Instruments, Inc. other than that obtained from Edwin B. King and/or Janet King.

13. All documents relating to any guaranties of indebtedness owed by Jumbo Mining Company, Asoma (Utah) Inc. and/or Asoma Instruments, Inc.

14. All financial statements and other accounting records (including books of account and general ledgers) for Jumbo Mining Company and/or Asoma (Utah) Inc.

15. All documents reflecting any customers, revenue or income derived by Jumbo Mining Company and/or Asoma (Utah) Inc.

16. All documents evidencing title to the assets of Jumbo Mining Company, Asoma (Utah) Inc. and/or Asoma Instruments, Inc.

17. All documents reflecting any accounts maintained by or for the benefit of Jumbo Mining Company, Asoma (Utah) Inc. or Asoma Instruments, Inc. at any banks, security brokerage firms or other financial institutions.